

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO

JOHN DOE,

Plaintiff,

v.

PROMEDICA HEALTH SYSTEM, INC.,

Defendant.

CASE NO. 3:20-cv-01581-JZ

JUDGE JACK ZOUHARY

MAGISTRATE JUDGE JAMES R. KNEPP, II

**UNOPPOSED MOTION FOR EXTENSION  
TO MOVE, PLEAD OR OTHERWISE  
RESPOND**

Defendant ProMedica Health System, Inc. and plaintiff John Doe have conferred regarding ProMedica's response date to answering or otherwise responding to Doe's complaint. Doe has informed ProMedica that he intends to move to remand this case back to the Lucas County Court of Common Pleas. Given this forthcoming remand motion, the parties have conferred and Doe does not object to extending ProMedica's answer date to move, plead or otherwise respond to Doe's complaint until twenty-one (21) days after the Court's ruling on Doe's motion to remand, for the parties to focus on these threshold jurisdictional questions. A proposed order reflecting the parties' agreement is attached to this consent motion if satisfactory to the Court.

Respectfully submitted,

/s/ David Carney

David A. Carney (0079824)  
Joshua D. Rovenger (0099328)  
BAKER & HOSTETLER LLP  
127 Public Square, Suite 2000  
Cleveland, Ohio 44114  
Telephone: (216) 621-0200  
Facsimile: (216) 696-0740  
Email: [dcarney@bakerlaw.com](mailto:dcarney@bakerlaw.com)  
Email: [jrovenger@bakerlaw.com](mailto:jrovenger@bakerlaw.com)

*Attorneys for Defendant ProMedica Health System, Inc.*

**CERTIFICATE OF SERVICE**

I certify that certify that a true and correct copy of the foregoing **UNOPPOSED MOTION FOR EXTENSION TO MOVE, PLEAD OR OTHERWISE RESPOND** was served on this 21st day of July, 2020 via the Court's electronic filing system on all counsel of record.

/s/ David A. Carney